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18 **UNITED STATES DISTRICT COURT**  
19 **EASTERN DISTRICT OF CALIFORNIA**

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21 UNITED STATES OF AMERICA,

22 Plaintiff,

23 v.

24 BLAKE WAYNE REED,

25 Defendant.

26 CASE NO: 1:23-CR-00101-ADA-BAM

27 STIPULATION TO CONTINUE AUGUST 9, 2023,  
28 STATUS CONFERENCE TO OCTOBER 11, 2023,  
1 AND REGARDING EXCLUDABLE TIME  
2 PERIODS UNDER SPEEDY TRIAL ACT; ORDER

3 DATE: August 9, 2023

4 TIME: 1:00 p.m.

5 COURT: Hon. Barbara A. McAuliffe

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24 **STIPULATION**

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28 THE PARTIES HEREBY STIPULATE, through their respective attorneys of record, Assistant  
1 United States Attorney Brittany M. Gunter, counsel for the government, and Erin Snider, counsel for  
2 Blake Wayne Reed (“defendant”), that this action’s **Wednesday, August 9, 2023, status conference be**  
3 **continued to Wednesday, October 11, 2023, at 1:00 p.m.** The parties likewise ask the court to  
4 endorse this stipulation by way of formal order.

5 The parties base this stipulation on good cause. Specifically,

6 1. The grand jury returned an indictment regarding this matter on May 25, 2023. Dkt. 1. Since  
7 that time, the parties agreed to and presented to the court a stipulation and proposed  
8 protective order regarding the production of third parties’ personal information without

1 redactions, which the court endorsed by way of formal order on June 16, 2023. Dkt. 13. The  
2 government then prepared and delivered an initial set of discovery to defense counsel within  
3 the time limits set forth by Eastern District of California Local Rule 440.

4 2. The government produced supplemental discovery subject to the protective order to the  
5 defense on July 19, 2023. The defense is and has been reviewing discovery thus far  
6 provided.

7 3. The government currently believes all discovery has been produced pursuant to Rule 16. If  
8 the government identifies additional information that should be produced as supplemental  
9 discovery, the government will promptly produce it in accord with Rule 16.

10 4. Defense counsel needs more time to complete its review of the discovery, conduct any  
11 additional investigation, and communicate with both the defendant and government counsel  
12 about any potential pretrial resolution of this case.

13 5. Defense counsel believes that failure to grant the above-requested continuance would deny  
14 her the reasonable time necessary for effective preparation, taking into account the exercise  
15 of due diligence.

16 6. The government does not object to the continuance.

17 7. The parties therefore stipulate that the period of time from August 9, 2023, through October  
18 11, 2023, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i)  
19 and (iv) because it results from a continuance granted by the Court at the parties' request on  
20 the basis of the Court's finding that the ends of justice served by taking such action outweigh  
21 the best interest of the public and the defendant in a speedy trial.

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27 IT IS SO STIPULATED.

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2 Dated: August 1, 2023

PHILLIP A. TALBERT  
United States Attorney

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5 Dated: August 1, 2023

By: /s/ BRITTANY M. GUNTER  
BRITTANY M. GUNTER  
Assistant United States Attorney

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By: /s/ ERIN SNIDER  
ERIN SNIDER  
Counsel for Defendant

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10 **ORDER**

11 IT IS SO ORDERED that the status conference is continued from August 9, 2023, to **October 11, 2023, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

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14 IT IS SO ORDERED.

15 Dated: August 2, 2023

/s/ Barbara A. McAuliffe

16 UNITED STATES MAGISTRATE JUDGE